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*Attorneys for Defendant
Otto Trucking LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE
IN SUPPORT OF DEFENDANT OTTO
TRUCKING'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS RESPONSE
PURSUANT TO ORDER REQUIRING
RESPONSE DECLARATIONS (DKT NO.
1601)**

Filed/Lodged Concurrently with:
1. Admin. Mtn. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

I, Neel Chatterjee, declare as follows:

1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of Its Response Pursuant to Order Requiring Response Declarations (Dkt No. 1601) (the “Response”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal	Designating Parties
Response	Green-highlighted portions	Waymo
Response	Blue-highlighted portions	Uber and Ottomotto

3. The above referenced portions of the Response contain information designated by Plaintiff Waymo LLC (“Waymo”) or Defendants Uber Technologies, Inc. (“Uber”) and Ottomotto LLC (“Ottomotto”) as either Highly Confidential—Attorneys’ Eyes Only” or “Confidential” under the terms of the parties’ protective order. Otto Trucking takes no position as to the merits of the confidentiality designations in these documents.

4. Otto Trucking anticipates that Waymo, Uber, and Ottomotto will file declarations in accordance with Local Rule 79-5.

5. Otto Trucking’s request to seal is narrowly tailored to those portions of the motion’s supporting documents that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18th day of September, 2017 in Los Angeles, California.

/s/ Neel Chatterjee
Neel Chatterjee